

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	

STIPULATION TO ENTRY OF PROTECTIVE ORDER

The City of Detroit, Michigan, the Police and Fire Retirement System of the City of Detroit, and the General Retirement System of the City of Detroit stipulate to entry of the Protective Order attached as Exhibit 1 hereto.

Stipulated and agreed to by:

JONES DAY

/s/ David G. Heiman

David G. Heiman (OH 0038271)
Heather Lennox (OH 0059649)
North Point
901 Lakeside Avenue
Cleveland, Ohio 441144
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
dgheiman@jonesday.com
hlennox@jonesday.com

and

Jonathan S. Green (MI P33140)
Stephen S. LaPlante (MI P48063)
MILLER, CANFIELD, PADDOCK
AND STONE, P.L.C.
150 West Jefferson
Suite 2500
Detroit, Michigan 48226
Telephone: (313) 963-6420
Facsimile: (313) 496-7500
green@millercanfield.com
laplante@millercanfield.com

*Counsel to the City of Detroit,
Michigan*

CLARK HILL PLC

/s/ Robert D. Gordon

Robert D. Gordon (P48627)
Shannon L. Deeby (P60242)
151 South Old Woodward Avenue
Suite 200
Birmingham, Michigan 48009
Telephone: (248) 988-5882
Facsimile: (248) 988-2502
rgordon@clarkhill.com
sdeeby@clarkhill.com

*Counsel to the Police and Fire
Retirement System of the City of Detroit
and the General Retirement System of
the City of Detroit*

EXHIBIT 1

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STIPULATED PROTECTIVE ORDER

This matter having come before the Court upon the Stipulation of the City of Detroit, Michigan (the “City”), the Police and Fire Retirement System of the City of Detroit (“PFRS”), and the General Retirement System of the City of Detroit (“GRS,” and together with PFRS, the “Retirement Systems”); the City having subpoenaed documents from the Retirement Systems’ actuary, Gabriel, Roeder, Smith & Co.; the Retirement Systems having reviewed the documents requested by the City and having determined that they may contain personally identifiable information including, but not limited to, social security numbers, dates of birth, pension identification numbers, home addresses, home telephone numbers, and financial account numbers of pensioners; and the City and the Retirement Systems desiring to protect personally identifiable information from disclosure; and the Court finding good cause for granting the relief herein:

IT IS HEREBY ORDERED:

1. The City shall keep confidential all personally identifiable information of third parties contained in any and all documents and materials that it receives from the Retirement Systems or Gabriel Roeder Smith & Co. Personally identifiable information shall include names, physical and electronic addresses, telephone numbers, social security numbers, dates of birth, pension identification numbers, financial account numbers, and any other information whose disclosure would create an undue risk of identity theft or other unlawful injury.

2. Nothing in this Order shall be deemed to waive any objections to the production of documents that the Retirement Systems may be entitled to assert under state and federal law, including M.C.L. § 38.1140h.

3. Nothing in this Order shall be deemed to waive any privileges that the Retirement Systems may be entitled to assert, including the attorney-client, work product, and/or accountant-client privileges.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.